

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

**NOTICE OF AGENDA FOR HEARING ON MARCH 31, 2025 AT 11:00 A.M. (ET)**<sup>2</sup>

**This proceeding will be conducted in-person.  
Delaware counsel is expected to appear in person and all other parties  
are permitted to appear remotely via Zoom.**

**Please refer to Judge Shannon's Chambers Procedures  
(<https://www.deb.uscourts.gov/judge-brendan-l-shannon>) and the  
Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>)  
for information on who may participate remotely, the method of allowed  
participation (video or audio), Judge Shannon's expectations of  
remote participants, and the advance registration requirements.**

**Registration is required by 4:00 p.m. (ET) the business day  
before the hearing unless otherwise noticed using the  
*eCourtAppearances* tool available on the Court's website.**

<sup>1</sup> The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], and 837 Park Avenue, LLC [3229]. The Debtors' headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

<sup>2</sup> All motions and other pleadings referenced herein are available online at the following address: <https://cases.stretto.com/momca>.

**MATTERS GOING FORWARD:**

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 8](#) - filed on March 11, 2025]

Response/Objection Deadline: March 24, 2025 at 4:00 p.m. (ET). Extended to March 26, 2025 at 12:00 p.m. (ET) solely with respect to PMF CA REIT, LLC, Enterprise Bank and Trust, Wilshire Quinn Income Fund, LLC, Lone Oak Mortgage Fund, LLC, Preferred Bank, The Picerne Group, Inc., and Banc of California.

Responses Received:

- a. Omnibus Limited Objection and Reservation of Rights of Mohammad Honarkar and 4G Wireless, Inc. to First Day Motions [[Docket No. 31](#) – filed on March 13, 2025]
- b. Objection of Enterprise Bank & Trust to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 40](#) – filed on March 13, 2025]
- c. Lone Oak Fund, LLC's Limited Objection and Reservation of Rights to the Debtors' Motion for Entry of Final Order (I) Authorizing Use of Post-Petition Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [[Docket No. 107](#) – filed on March 24, 2025]
- d. Wilshire Quinn Income Fund, LLC's Objection to the Debtors' Motion for Entry of Final Orders (I) Authorizing Use of Post-Petition Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [[Docket No. 110](#) – filed on March 24, 2025]
- e. Preferred Bank's Objection to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 128](#) – filed on March 26, 2025]

Related Documents:

- a. Certification of Counsel Regarding Revised Proposed Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 67](#) – filed on March 17, 2025]
- b. Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 83](#) – entered on March 19, 2025]
- c. Notice of Entry of Interim Order and Hearing Regarding Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 85](#) - filed on March 19, 2025]
- d. Notice of Filing of 13 Week Cash Flow Budgets [[Docket No. 135](#) – filed on March 27, 2025]

Status: The Debtors are working with the prepetition lenders on a further interim order. This matter is going forward.

2. Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 89](#) – filed on March 19, 2025]

Response/Objection Deadline: March 24, 2025 at 1:00 p.m. (ET).

Responses Received:

- a. Informal comments from the Office of the United States Trustee for the District of Delaware
- b. Objection of Mohammad Honarkar and 4G Wireless, Inc. to Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 96](#) – filed on March 21, 2025]
- c. Reservation of Rights of The Picerne Group, Inc. in Connection With the Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 103](#) – filed on March 23, 2025]

- d. Limited Objection of Banc of California to Debtors' Motion Authorizing Postpetition Financing [[Docket No. 104](#) – filed on March 23, 2025]
- e. Preferred Bank's Opposition to Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 108](#) – filed on March 24, 2025]

Related Documents:

- a. Re-Notice of Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 91](#) – filed on March 20, 2025]
- b. Certification of Counsel Regarding Bridge Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing and (II) Granting Related Relief [[Docket No. 112](#) – filed on March 25, 2025]
- c. Bridge Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing and (II) Granting Related Relief [[Docket No. 114](#) – entered on March 25, 2025]
- d. Notice of Filing of 13 Week Cash Flow Budgets [[Docket No. 135](#) – filed on March 27, 2025]

Status: The Debtors anticipate filing a supplemental declaration and/or reply in further support of the DIP Motion in advance of the hearing. This matter is going forward.

*Remainder of page intentionally left blank.*

Dated: March 27, 2025  
Wilmington, Delaware

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Respectfully submitted,

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